

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:
	:
Ross E. Baker	: Case No.: 18-17604-mdc
	:
	:
Debtor	: Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Ross E. Baker, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about November 15, 2018.
2. The Chapter 13 filing was assigned case number 18-17604.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about October 4, 2019.
4. On or about September 30, 2020 the Debtor and Wells Fargo Bank, NA entered into a Stipulation resolving the Motion for Relief of Debtor's 2014 Ford Focus.
5. Per the Stipulation, the Debtor is delinquent in the sum of \$6,864.35 in post-petition arrears, including attorney's fees and costs. A true and correct copy of the Stipulation is attached hereto as "**Exhibit A.**"
6. In accordance with the Stipulation, the Debtor shall amend his Chapter 13 Plan to include the post-petition delinquencies.
7. The Debtor fell behind in payments to the creditor because Debtor's wife was required to go to part-time employment for child care reasons; Debtor's wife has now returned to full-time employment.

8. In furtherance of the Stipulation, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

9. The Debtor's proposed modified Chapter 13 Plan attached hereto as "**Exhibit B**", is affordable to the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: October 16, 2020

/s/ Brad J. Sadek, Esq.
Brad J. Sadek, Esquire
Attorney for Debtor
1315 Walnut Street, Suite 502
Philadelphia, PA 19107